

EXHIBIT A

NOTICE OF CLAIM

THE STATE OF NEW YORK

SUPREME COURT OF COUNTY OF NASSAU

IN THE MATTER OF THE CLAIM OF CHARLES GRIFFIN individually and on behalf
of GERALDINE GRIFFIN, CRAIG GRIFFIN, individually, CARIL GRIFFIN SIMMONS
individually and on behalf of THE GRIFFIN FAMILY et. al

Against

INCORPORATED VILLAGE OF ROCKVILLE CENTRE, FRANCIS X. MURRAY, in
his official capacity as Mayor of the Incorporated Village of Rockville Centre, DANIEL
CASELLA, individually and in his official capacity as Building Department
Superintendent of the Incorporated Village of Rockville Centre, JOHN GOOCH,
individually and in his official capacity as a Building Inspector of the Incorporated Village
of Rockville Centre, THOMAS BUNTING individually and in his official capacity as
Building Inspector of the Incorporated Village of Rockville Centre, FIRE
DEPARTMENT, of the Incorporated Village of Rockville Centre, JOHN THORP,
individually and in his official capacity as Fire Chief of the Incorporated Village of
Rockville Centre, PETER KLUGEWICZ, individually and in his official capacity as Chief
Fire Safety Inspector of the Incorporated Village of Rockville Centre, POLICE
DEPARTMENT, of the Incorporated Village of Rockville Centre, et. al.

STATE OF NEW YORK)

) ss.

COUNTY OF NASSAU)

PLEASE TAKE NOTICE that I, CHARLES GRIFFIN individually and on behalf of
GERALDINE GRIFFIN, CRAIG GRIFFIN individually, CARIL GRIFFIN SIMMONS
individually and on behalf of THE GRIFFIN FAMILY et. al. herein give notice of claims
and state:

1. Our address is 257 North Village Avenue Rockville Centre, NY, Caril Griffin Simmons
address is 34 Fordham Road West Babylon, NY. Service of any correspondence regarding
this matter should be directed to both.

2. Claimants' claim, is for damages sustained from the VILLAGE of ROCKVILLE
CENTRE'S employees/agents abuse of power, abuse of power pursuant to an official
policy and custom, violation of Civil Rights including but not limited to USCA Section
1983, breaking-in and illegal entry, excessive force lacking probable cause or emergency
to conduct a warrantless administrative search and seizure, criminal trespass, unreasonable
search and seizure, destruction of and theft of private property, abuse of process; failure to
obtain consent or provide notice prior or notice post of search and seizure, violation of due

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process, deprivation of the use, enjoyment of and dominion over private property absent probable cause or due process remedies, unlawful inspection(s) without consent absent exigent circumstances, invasion of privacy, defamation, libel, slander, malice, intimidation, intentional infliction of emotional distress, intentional infliction of financial distress, malicious prosecution, harassment and for any and all damages that have arose or may arise from the incidents described herein.

3. The claim arose out of incidents that occurred in the following manner: During the claimants' remediation of a property maintenance violation alleged by the Building Department citing "overgrown trees & bushes, porch in disrepair, house needs paint" while the Griffins were not at home, in violation of Civil Rights, under color and authority of law in contravention of USCA Section 1983, without just or probable cause or provocation, Thomas Bunting of the Rockville Centre Building Department, upon information and belief, as a result of a neighbor's complaint regarding three sections of fencing replaced on the Griffin's property, summoned the Rockville Centre Fire Department, who were accompanied by the Rockville Centre Police to the premises designated and described as 257 North Village Avenue, Rockville Centre, New York at approximately 3:15 / P.M on May 1, 2013 to break into the curtilage, this time with approximately 250 Village residents witnessing, while congregating to pickup their children as school was letting out across the street. The Village Building Department, Fire Department and Police Department blocked off the street with numerous Village Fire, Building, and Police vehicles, more than a dozen Village employees gathered on the front lawn of the premises and sidewalk in front of the premises and proceeded to storm the locked driveway gate, cut numerous locks, to the Griffins' curtilage to rummage through the detached garage, shed, fenced in back yard and house to conduct a warrantless, unreasonable search and seizure. Property was destroyed and a hood ornament disappeared. The domicile and property were posted prohibiting entry and the electricity was turned off. John Gooch, Building Inspector, provided false post information depicting a preexisting inactive front porch light fixture wire as a safety issue and the reason the electricity was turned off, while Peter Klugewicz, Chief Fire Safety Inspector stated he was called to the property by the Building Department as a result of a neighbor's complaint, upon information and belief, a complaint precipitated by the Griffins' replacement of three sections of fencing. The Building Department on a prior date, August 20, 2012, in violation of Civil Rights, under color and authority of law in contravention of USCA Section 1983, without just or probable cause or provocation also summoned the Rockville Centre Fire Department accompanied by the Rockville Centre Police Department to the premises to conduct a warrantless administrative search and inspection as well as seizure, absent exigent circumstances, consent, notice or due process. A second floor window was found slightly ajar after this prior incident, but information on the extent of the Village's actions or illegal entry on that date have yet to be provided.

4. Further, with the intention of creating problems such as costs, attorneys' fees, and anguish a malicious prosecution without just or probable cause or provocation. was commenced, August 17, 2012 and is still on going by a Summons requiring, Caril Simmons's appearance in Rockville Centre Village Court for property maintenance re: 257 N. Village Ave, Rockville Centre NY 11570, Section: 38 Block: 160 Lot(s):10. The accompanying letter from the Building Department to Caril Simmons stated "While we




understand that efforts to clean up the property have begun, the purpose of this ticket is to keep the matter progressing in a more timely manner with the oversight of the Village Court." On May 9, 2013, the Village's prosecuting attorney with a similar intention of creating problems such as costs, attorney's fees, and anguish, threatened and stated that she would continue to require Caril Simmons to appear along with her attorney to inflict financial and emotional distress.

5. Further, Village employees in discussions May 9, 2013, fabricated and exaggerated a depiction of ordinary items in the Griffins' curtilage illegally entered on May 1, 2013, and upon information and belief, false and erroneous written documents were also promulgated to harass and further a malicious prosecution.

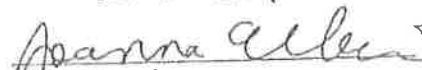
6. Further the Building Superintendent stated, May 9, 2013 that he was in the yard at 257 North Village Avenue. Upon information and belief, he was not present in the yard on May 1, 2013; notice is included herein for the unknown date of that trespass.

7. In accordance with the notice requirements delineated in N.Y. Gen. Mun. Law claimants hereby notify you that we intend to seek indemnification and/or contribution for the damages stated herein including but not limited to costs, attorney's fees, anguish, financial distress, violation of due process, violation of Civil Rights, trespass, deprivation of the use, enjoyment of and dominion over private property, destruction of and theft of private property, invasion of privacy, defamation, libel, slander, malice, intimidation, intentional infliction of emotional distress, intentional infliction of financial distress, malicious prosecution, harassment from the INCORPORATED VILLAGE OF ROCKVILLE CENTRE et.al. individually and collectively as the actual tortfeasors. The amount of damages exceeds the jurisdictional limits of all lower courts.

I make this Affidavit on my own accord. I have read this Affidavit consisting of seven paragraphs and it is true and correct to the best of my knowledge, information and belief.

Subscribed and sworn to before
me this 27th day of July, 2013


Notary Public

JOANNA ELKIN
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 01EL6157993
Qualified in Nassau County
Commission Expires Dec. 18, 2014